

# **Exhibit B**



2. Upon receipt of the aforesaid class member records, Plaintiff shall prepare a list of the names and addresses of all persons within the Disclosure and Pre-Adverse Action Sub-Class as reflected by ClosetMaid's records. ("Class List"). Plaintiff shall update the addresses on the Class List using the National Change Of Address Database ("NCOA") or similar database to obtain the most recently listed address of the class members. Plaintiff shall complete the Class List within 45 days of receiving the aforesaid class member records from ClosetMaid. Upon creation of the Class List, Plaintiff shall provide the list to ClosetMaid for review and comment. ClosetMaid shall have 20 days from receipt to provide comments or objections to the Class List. Plaintiff shall thereafter send the Notice Of Class Action Certification which is attached hereto by First Class mail to each of the class members at their address that appears on the Class List. For any Mail Notices returned as undeliverable, Plaintiff shall us utilize the services of a commercial database resources entity (e.g. Accurint, Trans Union, etc), and

attempt to obtain current mailing addresses for such returned notices, and should the commercial database show a more current address, Plaintiff shall re-post the returned Mail Notice to the more current address

3. The Court finds that Plaintiff's Proposed Plan and Form of Class Notice will provide the "best notice practicable under the circumstances" as required by Fed.R.Civ.P. 23(c)(2)(B);
4. The Court further finds that the form of notice which is attached hereto complies with Fed.R.Civ.P.23(c)(2)(B)(i)-(vii) since it will be disseminated by First Class mail and be supplemented by referring class members to a website which contains additional information. The proposed notice further sufficiently sets forth and explains the (i) the nature of the action; (ii) the definition of the class and subclass certified; (iii) the class claims, issues, or defenses; (iv) that a class member may enter an appearance through an attorney if the member so desires; (v) that the court will exclude from the class any member who requests exclusion; (vi) the time and manner for requesting exclusion; and

(vii) the binding effect of a class judgment on members under Rule 23(c)(3).

BY THE COURT:

\_\_\_\_\_ C.J.